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Federal Public Defender  
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6

7 Attorney for Mark Han

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARK HAN,

15 Defendant.

Case No. 2:14-cr-278-JAD-VCF

**UNOPPOSED MOTION TO  
CONTINUE SELF SURRENDER  
DATE**

16  
17 Comes now the defendant, Mark Han, by and through his counsel of record, Raquel  
18 Lazo, Assistant Federal Public Defender, and hereby moves this court for an order to continue  
19 his self surrender date for ninety (90) days. This motion is supported by the following  
20 Memorandum of Points and Authorities.

21 DATED this 27<sup>th</sup> day of October, 2015.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/Raquel Lazo

25 RAQUEL LAZO  
Assistant Federal Public Defender  
26 Attorney for Jose Jesus Gomez-Cabrera

**MEMORANDUM OF POINTS AND AUTHORITIES**

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2 1. Mr. Han is required to voluntarily surrender on November 23, 2015, before  
3 12:00 p.m. See Minutes (#39).

4 2. Mr. Han seeks a continuance of his surrender date to permit him to finish a  
5 project with his employer. He has been working on this project for quite some time and he and  
6 his boss would like for him to be able to conclude it. The opportunity to finish this project will  
7 also permit Mr. Han the ability to earn some extra money to be saved and used for when he is  
8 released from custody.

9 3. . Mr. Han's Pretrial Services Officer, Kamu Kapanui, has no opposition.  
10 Mr. Han is in full compliance.

11 4. The government also has no opposition.

12 DATED this 27<sup>th</sup> day of October, 2015.

13 Respectfully Submitted,

14 RENE L. VALLADARES  
15 Federal Public Defender

16 /s/ Raquel Lazo

17 By: \_\_\_\_\_  
18 RAQUEL LAZO,  
19 Assistant Federal Public Defender  
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARK HAN,

7 Defendant.

Case No. 2:14-cr-278-JAD-VCF

8 **PROPOSED ORDER**

9  
10 IT IS HEREBY ORDERED that Defendant Mark Han, have his self surrender day  
11 continued to February 23, 2016 \_.

12 DATED this\_28th day of October, 2015.

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16 UNITED STATES DISTRICT JUDGE  
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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on September 28, 2015, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
AMBER CRAIG  
Assistant United States Attorney  
333 Las Vegas Blvd. So. 5th Floor  
Las Vegas, NV 89101

/s/ Karen Meyer  
Employee of the Federal Public Defender